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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JASON BROTHERTON,

15 Defendant.

Case No. 2:16-mj-620-PAL

STIPULATION TO CONTINUE
PRELIMINARY HEARING
(Fourth Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre,
18 Acting United States Attorney, and Elham Roohani, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel
20 Lazo, Assistant Federal Public Defender, counsel for Jason Brotherton, that the Preliminary
21 Hearing currently scheduled on May 25, 2017 at 4:00 p.m., be vacated and continued to a date
22 and time convenient to the Court, but no sooner than ninety (90) days.

23 This Stipulation is entered into for the following reasons:

24 1. The parties have been actively working to reach a pre-indictment resolution.
25 However, negotiations stalled when government counsel went on maternity leave. The parties
26 expect that negotiations will resume upon government counsel's return to the office next month.

1 The parties are hopeful that they will reach a resolution and no further continuances will be
2 necessary.

3 2. Defendant is not incarcerated and does not object to a continuance.

4 3. Additionally, denial of this request for continuance could result in a miscarriage
5 of justice.

6 This is the fourth request for continuance filed herein.

7 DATED this 17th day of May, 2017.

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9 RENE L. VALLADARES
Federal Public Defender

STEVEN W. MYHRE
Acting United States Attorney

10
11 */s/ Raquel Lazo*
By _____

12 RAQUEL LAZO
13 Assistant Federal Public Defender

/s/ Elham Roohani
By _____

ELHAM ROOHANI
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JASON BROTHERTON,

7 Defendant.

Case No. 2:16-mj-620-PAL


ORDER

9
10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 May 25, 2017 at the hour of 4:00 p.m., be vacated and continued to August 23, 2017 at
13 the hour of 4:00 p.m.

14 IT IS FURTHER ORDERED that **no futher extensions will be allowed.**

15 DATED this 19th day of May, 2017.

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17 
18 UNITED STATES MAGISTRATE JUDGE